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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:

Revision of the Commission's
Rules To Ensure Compatibility
With Enhanced 911 Emergency
Calling Systems

CC Docket No. 94-102
RM-8143

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PETITION FOR EXTENSION OF TIME

The Personal Communications Industry Association ("PCIA")¹ respectfully submits a request for a 90 day extension of the filing deadline for comments, and a 120 day extension of the filing deadline for reply comments, in response to the above-captioned Further Notice of Proposed Rulemaking.² PCIA makes this request because its members require additional time to evaluate the effect of the FCC's proposed actions on wireless communications systems. In particular, PCIA is concerned that the highly technical nature of the proposals contained in the *Further Notice*, coupled with

¹ PCIA is an international trade association created to represent the interests of both the commercial and the private mobile radio service communications industries. PCIA's Federation of Councils includes: the Paging and Narrowband PCS Alliance, the Broadband PCS Alliance, the Specialized Mobile Radio Alliance, the Site Owners and Managers Association, the Association of Wireless System Integrators, the Association of Communications Technicians, and the Private System Users Alliance. In addition, as the FCC-appointed frequency coordinator for the 450-512 MHz bands in the Business Radio Service, the 800 and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies, PCIA represents and serves the interests of tens of thousands of licensees.

² FCC 96-264 (July 26, 1996) ("*Further Notice*").

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the fact that many of the proposals need not be implemented for at least five years, counsels against a hasty gathering of information in this proceeding.

In the *Further Notice*, the Commission seeks comment on a number of complex technical issues. First, it asks whether covered carriers should be required to provide Public Safety Answering Points ("PSAPs") with information that locates a wireless 911 caller within a 40 foot sphere 90 percent of the time.³ Second, it asks whether wireless service providers should be required to supply location information to the PSAP regarding a 911 caller within a certain number of seconds after the 911 call is made.⁴ Third, it asks whether wireless service providers should be required to update the location information throughout the duration of the call.⁵ Finally, it asks what steps could be taken to enable 911 calls to be completed or serviced by mobile radio systems regardless of the availability of the system or technology utilized by the user's wireless service.⁶

None of these questions is easily answered. For example, requiring wireless carriers to pass automatic location information ("ALI") that is accurate to a 40 foot sphere 90 percent of the time is a daunting technological task. In particular, it seems likely that meeting this standard might require the development of mobile unit based --

³ *Further Notice*, ¶¶ 138-139.

⁴ *Id.*, ¶ 142.

⁵ *Id.*

⁶ *Id.*, ¶ 147.

rather than network based -- technologies. This may be the only viable location solution for cable-based PCS systems because the base station may be miles away from the cable microcell integrator antenna. Similarly, it is probable that any requirement that the ALI be continually updated will require a great deal of coordination among mobile equipment manufacturers and telephone network engineers. Further, the ability to send 911 calls across different air interfaces is -- as recognized by the Commission⁷ -- an extremely ambitious undertaking,

In order for PCIA and its members to provide the Commission with the highest quality input on these proposals, additional time is needed for engineering departments to consider and discuss the technical issues at stake. These engineers may in turn have to discuss the proposals with other technical experts and manufacturing representatives. Given the complex nature of these issues, the Commission's proposed comment and reply comment deadlines seem to be unrealistically short.

In addition, the Commission is quite wisely not proposing to implement instantly its proposals. Rather, it is proposing at least five years for carriers to comply with some of its proposals (such as 40 foot spherical accuracy),⁸ and has proposed no certain deadlines for others (such as the receipt of 911 calls across different air

⁷ See *id.*, ¶ 146 ("Commenters also indicate that it may not be currently possible to transfer a call to another mobile carrier because the systems use different protocols").

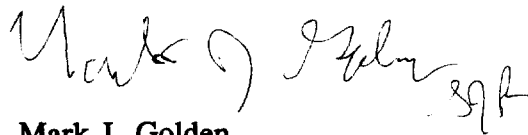
⁸ *Id.*, ¶ 137.

interfaces).⁹ Given these extended implementation deadlines, the Commission should not rush to collect data. Rather, it should give the affected parties sufficient time to produce informative pleadings.

For the aforementioned reasons, PCIA respectfully requests that the deadline for filing comments in this proceeding be extended until November 25, 1996, and the deadline for filing reply comments be extended until December 20, 1996.

Respectfully submitted,

**PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION**

A handwritten signature in dark ink, appearing to read "Mark J. Golden", with a stylized flourish at the end.

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⁹ *Id.*, ¶ 148.